

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
HATTIESBURG DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	Civil Action No. 2:67-CV-2216-HSO-JCG
	)	
SHEANDA BRYANT, <i>et al.</i> ,	)	
	)	
Plaintiff-Intervenors,	)	
v.	)	
	)	
LAWRENCE COUNTY SCHOOL	)	
DISTRICT, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	
	)	
	)	

**PLAINTIFF’S RESPONSE TO DEFENDANT’S MOTION TO MODIFY  
DESEGREGATION PLAN AND TO GRANT EXPEDITED CONSIDERATION OF  
CONSOLIDATION OF CITED SCHOOLS**

Plaintiff United States of America (the “United States”) respectfully submits the following response to Defendant Lawrence County School District’s (the “District”) Motion to Modify Desegregation Plan and to Grant Expedited Consideration of Consolidation of Cited Schools, dated September 11, 2021. ECF No. 23.

On March 16, 2021, the District formally requested that the United States and Plaintiff-Intervenors review and approve the District’s proposed school consolidation plan. District’s Mem. in Supp. of Mot., Ex. D, ECF No. 25-2. Following this request, the United States sent the District a series of inquiries regarding “whether and how the District’s desegregation obligations factored into its proposed consolidation plan, the plan’s potential impact on student transfers and student assignment, the community’s involvement in the school board’s selection of the proposed plan,

and the alternative consolidation plans the school board considered.” *Id.* Ex. E at 1-2, ECF No. 25-3. After carefully reviewing the information provided in response to its inquiries, on July 2, 2021, the United States informed the District by letter that it does not object to the District’s proposed school consolidation plan. *Id.* at 2.

Having previously informed the District that it does not object to its proposed school consolidation plan, the United States does not oppose the District’s instant Motion to Modify Desegregation Plan and to Grant Expedited Consideration of Consolidation of Cited Schools.

Respectfully submitted this 27th day of September, 2021:

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 27th day of September 2021, I electronically filed the foregoing Plaintiff's Response to Defendant's Motion to Modify Desegregation Plan and to Grant Expedited Consideration of Consolidation of Cited Schools with the Clerk of the Court using the CM/ECF system, thereby providing service on all counsel of record.

/s/ Peter W. Beauchamp  
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